

FILED
Clerk
District Court

MAR 10 2008

For The Northern Mariana Islands
By _____
(Deputy Clerk)

UNITED STATES DISTRICT COURT
NORTHERN MARIANA ISLANDS

UNITED STATES OF AMERICA,

Plaintiff,

v.

AMIN, MOHAMAD RUHUL,

Defendant.

Criminal Case No. 08-00002

STIPULATED STATEMENT OF THE CASE
AND ELEMENTS OF THE CHARGES

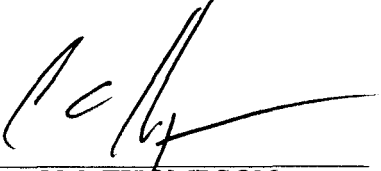
Trial: March 10, 2008


Time: 9:00 a.m.

Judge: Hon. Alex R. Munson

The parties in the above-captioned case hereby stipulate and agree to the attached proposed statement of the case and the elements of the charges.

LEONARDO M. RAPADAS
United States Attorney
District of the Northern Mariana Islands


COLIN M. THOMPSON
Attorney for Defendant

By: 
ERIC S. O'MALLEY
Assistant United States Attorney

DATE: 3/10/08

DATE: 3.10.8

UNITED STATES v. AMIN, MOHAMAD RUHUL

STATEMENT OF THE CASE

In this case, the government first alleges that the defendant conspired to commit, and actually did commit, the crime of making false statements in an application for a United States passport. The government also alleges the defendant committed the crime of subornation of perjury, which means he convinced another person to make a false statement, either under oath, or under penalty of perjury. The defendant denies these allegations and is presumed innocent until proven guilty beyond a reasonable doubt.

UNITED STATES v. AMIN, MOHAMAD RUHUL

ELEMENTS OF THE CHARGES

Count One: Conspiracy

First, there was an agreement between two or more persons to commit at least one crime as charged in the Indictment;

Second, the defendant, Mohamad Ruhul Amin, became a member of the conspiracy knowing at least one of its objects and intending to help accomplish it; and

Third, one of the members of the conspiracy performed at least one overt act for the purpose of carrying out the conspiracy, with all of you agreeing on a particular overt act that you find was committed.

Count Two: False Statement in Application for a Passport

First, that the defendant, Mohamad Ruhul Amin, knowingly and intentionally made a false or fraudulent statement on an application for a United States passport, and

Second, the defendant intended to secure the issuance of a United States passport.

Count Three: Subornation of Perjury

First, the defendant, Mohamad Ruhul Amin, persuaded another person to make at least one false statement under penalty of perjury;

Second, Rose Mayo Omar Reyes falsely stated under oath that the defendant was her spouse and/or that her name was Rose Mayo Amin;

Third, at least one of the statements was material to the application; and

Fourth, Rose Mayo Omar Reyes knew that statement was false.